

JUN 11 2014

**SPIDENT Co., Ltd.**

203 & 312, Korea Industrial Complex, 722, Gojan-Dong,
Namdong-Gu, Incheon, Korea 405-821
Tel: +82(32)819-4570 Fax : +82(32)819-4572

510(k) Summary

This summary of 510(k) safety and effectiveness information is being submitted in accordance with requirements of 21 CFR Part 807.92(c).

Date: November 22, 2013

1. Company and Correspondent making the submission:

	Company
Name	SPIDENT Co., Ltd.
Address	203 & 312, Korea Industrial Complex, 722, Gojan-Dong, Namdong-Gu, Incheon, Korea 405-821
Phone	+82(32)819-4570
Fax	+82(32)819-4572
Contact	J. M. Ahn/President

2. Device:

Proprietary Name – Base it

Common Name – Calcium hydroxide cavity liner.

Classification Name – liner, cavity, calcium hydroxide

3. Predicate Device:

LIME-LITE, K953079 (LIMELIGHT)

4. Classifications Names & Citations:

EJK, 872.3250

5. Description:

Base it is light-cured Cavity Liner. It is radiopaque cavity liner and base material specially formulated for use with adhesives, composites and conventional restorative materials. It has urethane dimethacrylate base and is similar in chemistry to dental composites.

Base it is similar to other commercially available products based on the intended use, the technology used, the claims, the material composition employed and performance characteristics. It is substantially equivalent in design, function and intended use to the predicate devices.



SPIDENT Co., Ltd.

203 & 312, Korea Industrial Complex, 722, Gojan-Dong,

Namdong-Gu, Incheon, Korea 405-821

Tel: +82(32)819-4570 Fax : +82(32)819-4572

6. Indication for use:

Base it is a light-cured, radiopaque dental liner and base material that Contains calcium hydroxyl apatite in a urethane dimethacrylate oligomer. Base it is used to line cavity preparations before restoration.

7. Performance

Testing performed including Flexural strength, Depth of cure, Compressive strength, Radio-opacity, Water sorption, Solubility, Radio-opacity use which demonstrated that the Base it is equivalent to the predicates in specifications and performance characteristics.

Therefore, it was considered that the subject device was as effective as and performs as good as the predicate device.

In conclusion, it can be said that the effectiveness and performance of the subject device are substantially equivalent to those of the predicate device.

8. Biocompatibility

Biocompatibility testing confirmed that the device meets the applicable requirements of the FDA Blue Book Memorandum #95-1 entitled Use of International Standards ISO 10993 Biological Evaluation of Medical Devices Part -1: Evaluation and Testing, and is biocompatible. Accordingly, it was considered that the subject device was substantially equivalent in safety to the predicate device.

No.	Testing Biocompatibility	Results
1	Cytotoxicity	Pass
2	Sensitization	Pass
3	Irritation or Intracutaneous reactivity	Pass
4	Subacute toxicity	Pass
5	Genotoxicity	Pass

9. Review:

The Base it has the similar device characteristics as the predicate device, the LIME-LITE; intended use, material, chemical composition, design and use concept are similar.

The Base it has the similar mechanical properties as the predicate device; Flexural Strength, Depth of cure, Compressive Strength, and Solubility.

The Base it has been subjected to extensive safety, performance, and product validations prior to release. Safety tests including biocompatibility have been performed to ensure the devices comply with the US regulations and ISO 9917-2.



SPIDENT Co., Ltd.

203 & 312, Korea Industrial Complex, 722, Gojan-Dong,
Namdong-Gu, Incheon, Korea 405-821
Tel: +82(32)819-4570 Fax : +82(32)819-4572

Based on the comparison of intended use and technical features, the Base it is substantially equivalent to the predicate devices.

10. Conclusions:

In accordance with the Federal Food, Drug and Cosmetic Act, 21 CFR Part 807, FDA's "Guidance for the Preparation of Premarket notifications for Dental Composite" and based on the information provided in this premarket notification SPIDENT Co., Ltd. concludes that the Base it is safe and effective and substantially equivalent to predicate devices as described herein.

11. SPIDENT Co., Ltd. will update and include in this summary any other information deemed reasonably necessary by the FDA.

END



Food and Drug Administration
10903 New Hampshire Avenue
Document Control Center – WO66-G609
Silver Spring, MD 20993-0002

June 11, 2014

SPIDENT Company, Limited
C/O Ms. Lena Pak
SPIDENT USA, Incorporated
2115 Linwood Avenue 5th Floor, Suite 521
Fort Lee, NJ 07024

Re: K134022

Trade/Device Name: Base It
Regulation Number: 21 CFR 872.3250
Regulation Name: Calcium Hydroxide Cavity Liner
Regulatory Class: II
Product Code: EJK
Dated: March 5, 2014
Received: March 14, 2014

Dear Ms. Pak:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

<http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

Mary S. Runner -
S

Erin I. Keith, M.S.
Division Director
Division of Anesthesiology, General Hospital,
Respiratory, Infection Control and Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

510(k) Submission - Base it

510(k) Number K K134022

Device Name: Base it

Indication for use:

Base it is a light-cured, radiopaque dental liner and base material that Contains calcium hydroxyl apatite in a urethane dimethacrylate oligomer. Base it is used to line cavity preparations before restoration.

Prescription Use ✓ AND/OR Over-The-Counter Use _____
(Per 21CFR801 Subpart D) (Per 21CFR807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF
NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Sheena A. Green -S
2014.06.11 11:21:30 -04'00'

0 0 0 0 2 3